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## Westlands Water District

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June 3, 1997

### HAND DELIVERED

Mr. Walt Pettit  
Executive Director  
State Water Resources Control Board  
901 P Street  
Sacramento, California 95814

Re: Petition to Relax Delta Inflow/Export Ratio for  
CVP and SWP

Dear Mr. Pettit:

This letter is written in support of the petition filed on May 29, 1997, by the United States Bureau of Reclamation ("Bureau") and the California Department of Water Resources ("DWR") to relax the Sacramento-San Joaquin Rivers Delta inflow/export ratio for the month of June, 1997. This measure was identified by the CalFED Management Team in its April 25, 1997, memorandum as a means of making up water lost as a result voluntary reductions in diversions from the Delta during the period from April 15 through May 15 for the protection of Delta smelt and the fall-run San Joaquin River chinook salmon. If this measure is not approved, there is a significant chance that storage in San Luis Reservoir will drop below a point in mid to late August, 1997, at which releases could no longer be made to meet demands within the service area of Central Valley Project contractors served by the Reservoir. This could have disastrous effects on water users in Westlands.

As you know, Westlands Water District is a California water district located within Fresno and Kings Counties, and pursuant to a water service contract, it receives water from the United States Bureau of Reclamation ("Bureau"), which diverts water from the Sacramento-San Joaquin River Delta via the Delta-Mendota Canal and then stores water in the San Luis Reservoir. Westlands has a contractual entitlement for the delivery of 1,150,000 acre feet of Central Valley Project water.

Under the Principles for Agreement on Bay-Delta Standards Between the State of California and the Federal Government, which was signed on December 15, 1994, the May 1995 Water Quality Control

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Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary ("95-1 WR"), and Water Rights Decision 95-6; for the period from March through June, combined exports from the Delta by the Bureau and DWR shall be no greater than 35% of Delta inflow, provided that during the April/May 30 day pulse flow in the San Joaquin River, the combined exports from the Delta may not exceed a rate equal to the total flow of the San Joaquin River at Vernalis or 1,500 cubic feet per second, whichever is greater.

During the spring of 1997, the Bureau reached an agreement with Merced Irrigation District to increase flows in the Merced River and at Vernalis during the pulse flow period. Pursuant to the Accord, such acquired flows would not be included in the determination of the amount of water that can be diverted by the state and federal projects.

On April 15, 1997, at the request of the Fish and Wildlife Service, the Bureau and DWR reduced their diversions from the Delta to 2,250 cfs while the San Joaquin River flow at Vernalis, absent the flows acquired from Merced I.D., was approximately 3,300 cfs. Thus, there was a reduction in exports to levels less than allowed under the Accord, 95-1 WR, and Decision 95-6. This reduction in exports was reflected in reduced storage in San Luis Reservoir by the amount of export reduction. In addition to the pulse flow export reduction, exports were limited after May 15 for the benefit of aquatic resources.

It is estimated that the total reduction in exports resulting from these actions is approximately 170,000 acre feet. The Bureau's prior analysis of storage in San Luis Reservoir indicates that reduced exports during the April 15 to May 15 period will result in minimum storage levels by mid to late August at 121,000 acre-feet. Such levels would have the following impacts:

When total storage in San Luis reaches 175,000 acre-feet, the quality of the water being diverted to the San Felipe Unit is degraded such that it cannot be used for domestic purposes by Santa Clara Valley Water District. When total storage reaches 135,000 acre-feet deliveries to the San Felipe Unit are no longer possible, including Santa Clara Valley Water District and San Benito County Water District. At approximately 80,000 acre-feet no diversions are possible from San Luis Reservoir.

The operational forecasts which result in the above-described storage levels are based on estimates of future water use based primarily on historic delivery patterns. If the summer of 1997 is hotter than normal, it is likely that deliveries to

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contractors would exceed the currently scheduled deliveries. If that were to occur, storage in San Luis Reservoir could reach 80,000 acre-feet sometime in early to mid-August.

A relaxation of the inflow/export ratio was identified by the CalFED Management Team as a means of providing assurances that there will be sufficient water in San Luis Reservoir to meet the irrigation and domestic water supply needs of its contractors. The Group also identified other measures to be implemented by project contractors to defer demand. These other measures are being implemented, but through May 31, 1997, demand within the San Luis Unit service area is near historic levels. Therefore, without a relaxation of the inflow/export ration, it will probably be necessary to limit or cease deliveries to water users prior to or at the time that San Luis Reservoir storage is depleted.

If deliveries to agricultural contractors are terminated or curtailed, there will be significant damage to most, if not all, of the crops being produced in the area served by the San Luis Reservoir. Depending on the time and severity of the delivery curtailment, crops such as cotton would suffer severely reduced yields. While groundwater pumping could mitigate some of the damage, not all farmers have access to groundwater and not all groundwater sources are sufficient to meet cropping demands during high irrigation periods. In Westlands, it is estimated that 270,000 acres of cotton have been planted in 1997. The average gross value of cotton crops in Westlands is approximately \$1,200 per acre. In addition, fall crops, processing tomatoes, pistachios and vineyards would be critically impacted by reduced deliveries.

There are also a number of municipal and industrial water users served by Westlands that may be impacted if releases cannot be made from San Luis Reservoir. These include the City of Coalinga, Lemoore Naval Air Station, the City of Huron, the community of Cantua Creek, the community of Three Rocks, Harris Ranch, Los Gatos Tomato Products, and Hunt Foods-Helm. If Westlands is unable to prevent agricultural water users from dewatering its distribution system, some M&I users served by Westlands will have no water supply.

If San Luis Reservoir were to go below a level at which releases from storage could not be made, the entire service area of contractors served by the Bureau's Delta export facilities would have to rely on direct diversions from the Delta. Historically, the Bureau has delivered the first 2,316 cubic feet per second of its diversion capacity to the Exchange Contractors. If the Bureau operated its facilities in this manner during 1997, and the

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remaining 2,135 cfs of capacity were divided proportionately among other contractors, Westlands would receive a supply of approximately 1,100 cfs. Westlands total demand during this period would normally be approximately 4,000 cfs.

As indicated in the CalFED Management Team memorandum of April 25, 1997, the action to reduce exports during the April 15 to May 15 period was taken under the no-net-loss principle of the Accord, and a commitment was made prevent storage in San Luis Reservoir from falling below 150,000 acre feet. Without a relaxation of the inflow/export ratio during the month of June there is a significant probability that the foregone exports will not be made up and that storage in San Luis Reservoir will be inadequate to satisfy demand during the remainder of this irrigation season. An inability to satisfy this demand will have enormous economic consequences. Therefore, Westlands urges that you approve the petition.

Your consideration of these comments is appreciated.

Very truly yours,

*David Orth*  
David Orth  
General Manager

cc: Roger Patterson  
David Kennedy  
Dan Nelson  
Jason Peltier

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